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September 29, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, Massachusetts 02110

Re: Investigation of Rates to be Charged by the Massachusetts Turnpike Authority for  
Wireless Providers, D.T.E. 06-70

Dear Ms. Cottrell:

This letter is submitted on behalf of the Joint Carriers participating as intervenors in the above-referenced proceeding, which are Bell Atlantic Mobile of Massachusetts Corporation, Ltd. d/b/a Verizon Wireless, New Cingular Wireless PCS, LLC and Sprint Spectrum L.P. and Nextel Communications of the Mid-Atlantic, Inc.

On September 19, 2006, the Joint Carriers issued its First Set of Information Requests to the Massachusetts Turnpike Authority ("MTA"). Under the ground rules and schedule established by the Department of Telecommunications and Energy ("Department"), there is a five business-day turnaround required for the submission of responses to discovery requests. In this case, the deadline for the MTA's response to the Joint Carriers' discovery was the close of business Tuesday, September 26, 2006. As of this date, no responses have been filed by MTA.

Under established Department practice, a party seeking additional time to meet a deadline has an obligation to arrange for an extension from the proponent of the discovery or to request and receive such an extension from the Department. The MTA has not availed itself of either option and the discovery remains outstanding in contravention of the Department's schedule.

This delay and non-conformance with the Department's procedural requirements is of concern to the Joint Carriers because the deadline for filing of the direct testimony of the intervenors is Monday, October 2, 2006. The Joint Carriers will file testimony on that date in accordance with the Department's ruling on schedule. However, the Joint Carriers' opportunity to develop testimony that fully addresses the issues before the Department in this

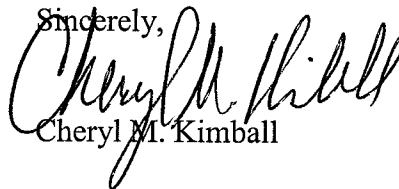
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proceeding is impeded both by the MTA's lack of adherence to the Department's procedural schedule and the dearth of information provided by the MTA regarding its "proposal." Given the short-time frame available for the conduct of this proceeding, the Joint Carriers are concerned that repeated delays by the MTA, especially without regard for the Department's procedural protocols, will unfairly affect the Joint Carriers' ability to litigate the issues in this case and will place undue burden on the Department in completing its work within the allotted timeframe.

At this time, the Joint Carriers make no Motion to Compel based on the representation of MTA's counsel that full discovery responses will be filed the week of October 2, 2006. However, the Joint Carriers will proceed with this option if the circumstances warrant.

Please do not hesitate to contact me if you have any questions or if I can provide you with any additional information.

Thank you very much for your attention to this matter.

Sincerely,  
  
Cheryl M. Kimball

Enclosure

cc: Service List